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9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
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12 In Re 17 U.S.C. § 512(h) Subpoena to  
13 CLOUDFLARE, INC.

Case Number: 2:23-mc-00093

**DECLARATION OF JAN VAN  
VOORN IN SUPPORT OF  
ISSUANCE OF SUBPOENA  
PURSUANT TO 17 U.S.C. § 512(h)**

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20 I, Jan van Voorn, the undersigned, declare that:

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22 1. I am Executive Vice President and Chief of Global Content Protection  
23 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on  
24 behalf of Disney Enterprises, Inc., Disney Enterprises, Inc. & Pixar, and Warner  
25 Bros. Entertainment, Inc. (“ACE Members”), each of which is a member of the  
26 Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of  
27 leading content creators and on-demand entertainment services committed to  
28 supporting the legal marketplace for video content and addressing the challenge of

1 online piracy. The ACE Members, whether themselves or through subsidiaries and  
2 affiliates, own the copyrights in the below referenced copyrighted works.

3 2. The ACE Members (via the Motion Picture Association, Inc.) are  
4 requesting issuance of the attached proposed subpoena that would order Cloudflare,  
5 Inc. to disclose the identities, including names, physical addresses, IP addresses,  
6 telephone numbers, e-mail addresses, payment information, account updates and  
7 account histories of the users operating the following websites:

No	App Name	Download Site	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	Israel FM Version: 27-10-2022, 3.0.85 (551)	amw.su	Lightyear	c2.fastcdn.com.my/vod-temp/movies/kids/Lightyear_2022.mp4/index.m3u8?misc=JSjtUVRdywPwtVeZtNufww00MQoKpb-eK5BkKUdcQU&uid=140233&sid=QFg_arhVU_o-nuIXx0qSaPt7HKnsbF9L&ts=1686864352&e=43200&lat=1686864352&sil=5&sk=no&uip=ODEuMjQwLjgxLjUw&head=aHR0cF94X2ZvcndhcmRlZF9mb3I	Fantastic Beasts and Where to Find Them	c2.fastcdn.com.my/vod-temp/movies/kids/harry.potter/hayot.aple.vehan.limto.ota.m.mp4/index.m3u8?misc=Q-BVVwAsze aYyZxZwXiNvSKeYpZF3wtlqKnHaSmIFNE&uid=140233&sid=QFg_arhVU_o-nuIXx0qSaPt7HKnsbF9L&ts=1686864903&e=43200

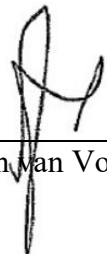
No	App Name	Download Site	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
						&lat=1686864903&sil=5&sk=no&uip=ODEuMjQwLjgxljUw&head=aHR0cF94X2ZvcndhcmRlZF9mb3I
2	Israel Radio Version: 26-12-2022, 1.7.63 (151)	afs.su	Fantastic Beasts: The Crimes of Grindelwald	c2.fastcdn.com.my/vod-temp/movies/kids/harry.poter/hayot.apeshaim.shel.grindlvoId.mp4/index.m3u8?misc=bTrE84sS20SGmDoTVYjZsWhC_ruT0HCNazuhCuu3R_A&uid=140233&sid=tXuZVpHjDWw1zYBudXEpl30NTqtcCmPL&ts=1686865487&e=43200&lat=1686865487&sil=5&sk=no&uip=ODEuMjQwLjgxljUw&head=aHR0cF94X2Zvcn	Encanto	c2.fastcdn.com.my/vod-temp/movies/kids/Encanto_2021.mp4/index.m3u8?misc=8xrwe2WvZlhl_M6N0GXcNAIjBDT4-yGdIOZKEuyJo2g&uid=140233&sid=tXuZVpHjDWw1zYBudXEpl30NTqtcCmPL&ts=1686865650&e=43200&lat=1686865650&sil=5&sk

No	App Name	Download Site	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				dhcmRIZF9mb3I		=no&uip=ODEuMjQwLjgxLjUw&head=aHR0cF94X2ZvcndhcmRIZF9mb3I

3. The purpose for which this subpoena is sought is to obtain the identities of the individuals assigned to these websites who have exploited ACE Members' exclusive rights in their copyrighted motion pictures without their authorization. This information will only be used for the purposes of protecting the rights granted to ACE Members, the motion picture copyright owners, under Title II of the Digital Millennium Copyright Act.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information or belief.

Executed at Redondo Beach, California, on July 5, 2023.

  
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Jan van Voorn